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13 UNITED STATES DISTRICT COURT  
14 FOR THE DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **CONSENT MOTION TO FILE UNDER  
19 SEAL EXHIBIT A TO PLAINTIFF'S  
20 OPPOSITION TO DEFENDANTS'  
21 MOTION TO EXCLUDE THE TINLIN  
22 CASE-SPECIFIC OPINIONS OF  
23 ROBERT M. McMEEKING, PH.D.**

24 In accordance with Section 25 of the Stipulated Protective Order (Doc. 269),  
25 Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, Plaintiffs move  
26 this Court for an Order sealing Exhibit A to Plaintiff's Opposition to Defendants' Motion  
27 to Exclude the Tinlin Case-Specific Opinions of Robert M. McMeeking, Ph.D. This  
28 document contains or references information designated as "Confidential Information"  
under the Stipulated Protective Order.

The parties have met and conferred and agree that Exhibit A to Plaintiff's  
Opposition to Defendants' Motion to Exclude the Tinlin Case-Specific Opinions of  
Robert M. McMeeking, Ph.D. should be filed and maintained under seal. Based on the  
stipulation and the parties' consent to file the documents described above under seal for

1 purposes of consideration of the same, the parties jointly request that the exhibits be  
2 sealed.

3 RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of March, 2019.

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5 By: /s/ Mark S. O'Connor

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of March, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine